

**UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

v.

LONNEL DIGGS,  
a/k/a "CASH,"  
a/k/a "CASHIISO RUNZITUP"

No. 2:23-cr-134-NT

**PROSECUTION VERSION**

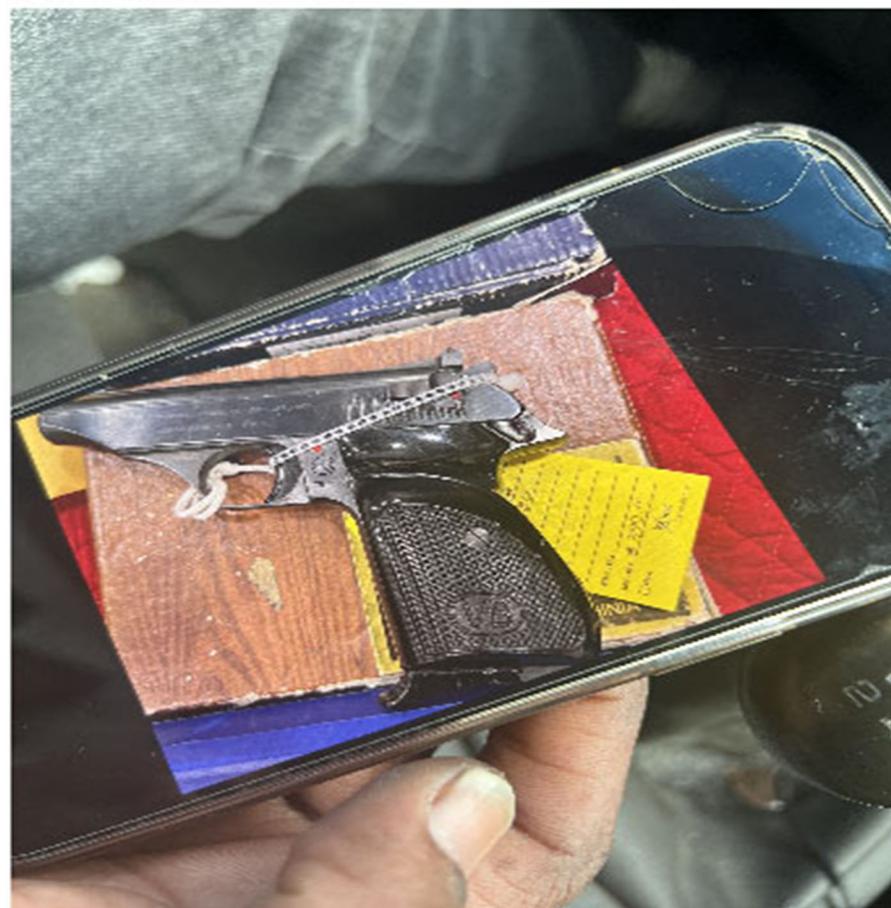
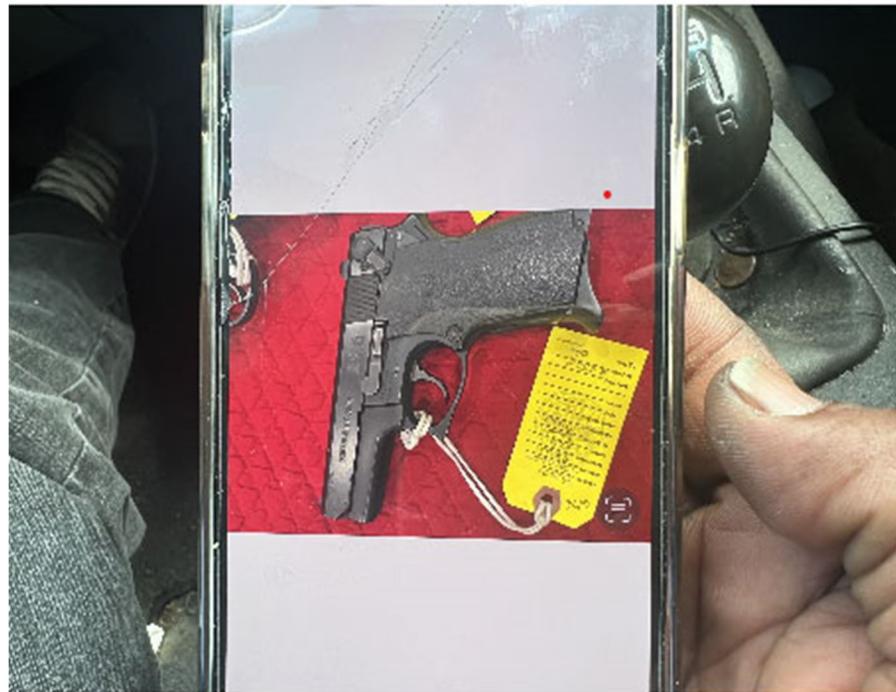
The evidence in this case established the following facts:

1. In early 2022, a woman by the name of Jennifer Scruggs and her then-boyfriend Aaron Michaud began purchasing crack cocaine from the defendant LONNEL DIGGS, a/k/a "Cash," and others, in Lewiston, Maine. At the time, the defendant was prohibited by law from possessing firearms or ammunition because he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year and had in fact served more than a year in a California state prison in connection with those prior convictions. More specifically the defendant had previously been convicted in the State of California of: (1) Robbery in 2003, for which he received a sentence of 3 years in prison (Docket #XNVPAo4225401/LOS ANGELES); and (2) Assault with a Dangerous Weapon on a Peace Officer in 2010, for which he received a sentence of 8 years (Docket #XNVPAo6179202/LOS ANGELES).

2. Beginning in or around March of 2022, the defendant and another individual proposed that Jennifer Scruggs purchase firearms for them in return for a combination of cash and crack cocaine. Scruggs agreed to do so and thereafter traveled to gun shows and gun stores in the District of Maine to purchase firearms for the defendant and the other individual.

3. On March 20, 2022, the defendant and another individual went to the Bucksport Gun Show in Orland, Maine for the purpose of selecting firearms that they wanted Scruggs and Michaud to purchase for them. While they were at the gun show, the defendant took photographs of three firearms with his cell phone: (1) a Beretta M9A3 bearing serial number B033014Z; (2) a Bernadelli, Vincenzo Model 80, .380 caliber handgun; and (3) a Smith & Wesson handgun, model 469, bearing serial number TAC0620. The photos taken by the defendant are depicted below:





4. At approximately 12:52 p.m. on March 20, 2022, the defendant texted the photos of the firearms depicted above to Scruggs and Michaud. Shortly thereafter, the defendant provided them with cash to purchase the above-described firearms. That same day, on March 20, 2022, Scruggs, accompanied by Michaud, purchased the above-described firearms at the Bucksport Gun Show from Ballstown Firearms for DIGGS and provided them to him, including the Beretta M9A3 bearing serial number B033014Z. That Beretta firearm, which is the subject of Count Seven in the Indictment, had previously been shipped and transported in interstate commerce.

Date: August 12, 2024

Respectfully Submitted:

DARCIE N. MCCELWEE  
United States Attorney

/s/ Sheila W. Sawyer

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## CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2024, I filed the foregoing Prosecution Version with the Clerk of Court using the CM/ECF system which will send notifications of such filing(s) to all counsel of record.

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*/s/ Grace Herrick*  
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